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9 *Attorneys for Defendants*

10  
11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

13  
14 *In re: Hyundai and Kia Engine*  
15 *Litigation II*

CASE No. 8:18-cv-02223-JLS-JDE

16 **STATUS UPDATE REGARDING**  
17 **NOTICE TO 2017–2020 KIA**  
18 **OPTIMA PHEV CLASS MEMBERS**

19 The Hon. Josephine L. Staton  
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1 Pursuant to the Court’s order approving a modified notice to owners and lessees  
2 of 2017–2020 model year (“MY”) Kia Optima PHEV vehicles, Dkt. 122, the Kia  
3 defendants provide the following update:

4 **Notice to Affected Class Members.** On August 18, 2023, Epiq emailed the  
5 summary notice to 4,464 class members. *See* Declaration of Amanda Sternberg  
6 (“Sternberg Decl.”) ¶ 6. Only 253 of these email notices were returned to Epiq as  
7 undeliverable, ¶ 7, representing a 94% success rate.

8 On September 6, 2023, Epiq mailed (via first class mail) 5,403 Class Notices  
9 with a Court-approved cover notice to these affected class members. *Id.* ¶ 8. Of these  
10 notices, 146 were returned as undeliverable, and Epiq then remailed 82 notice  
11 packages after performing advanced address research. *Id.* ¶ 9. This represents a 98%  
12 rate of successful notice via mail.

13 **Opt Outs and Objections.** The deadline for owners or lessees of 2017–2020  
14 MY Kia Optima PHEV vehicles to opt out or object was October 5, 2023. Dkt. 122.  
15 As of October 17, 2023, Kia’s settlement administrator has received one opt out  
16 request and no objections from affected class members. Sternberg Decl. ¶ 12.

17 **Claims Received.** As of October 17, 2023, Epiq has received claim forms from  
18 22 affected class members. *Id.* ¶ 10. Apart from applying the modified deadlines as  
19 specified in the Court’s order (Dkt. 122), Epiq is reviewing these claims as part of its  
20 normal claims review process. *Id.* ¶ 11. These claims are also included as part of the  
21 regular claims reporting to Class Counsel. *Id.*

22 **KSDS Installation Rates.** For these affected class members, the deadline to  
23 install the knock sensor detection software update to be eligible for certain claims  
24 under the settlement is February 2, 2024. Dkt. 122. Approximately 2,104 2017–2020  
25 MY Kia Optima PHEV vehicles, or approximately 74%, have KSDS installed as of  
26 October 17, 2023. Sternberg Decl. ¶ 13.

27 Given that only one affected class member has requested exclusion and no  
28 affected class member objected to the settlement, Kia proposes that no further hearing

1 is necessary at this time.

2  
3 DATED: October 19, 2023

QUINN EMANUEL URQUHART &  
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6 By /s/ Shon Morgan  
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9 *Inc., and Kia Corporation*  
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